

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

LANCE LEDET, Individually and for Others
Similarly Situated,

v.

H&K ENGINEERING, LLC and ORBITAL
ENGINEERING INC.

Case No. 2:22-CV-01324-CRE

Collective Action

Jury Trial Demanded

CONSENT MOTION FOR APPROVAL OF COLLECTIVE ACTION SETTLEMENT

Plaintiff Lance Ledet, with consent of Defendants H&K Engineering, LLC and Orbital Engineering, Inc. (Ledet, H&K, and Orbital together, the Parties), moves the Court to approve the Parties' collective action settlement. Plaintiff submits that the settlement is a result of a *bona fide* dispute, negotiated at arms-length, by experienced Parties with the help of a well-known wage and hour Mediator, Carole Katz. Plaintiff believes the settlement is fair and reasonable and should therefore be approved. A brief in support, the settlement agreement, a declaration, and proposed Order are filed herewith.

Dated: June 7, 2023

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF electronic filing on all known parties on June 7, 2023, in accordance with the Federal Rules of Civil Procedure.

/s/ Andrew W. Dunlap
Andrew W. Dunlap

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Counsel for Defendants who consent to the filing of this Motion.

/s/ Andrew W. Dunlap
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